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October 23, 2009

Mr. Brad Hubbard
U.S. Bureau of Reclamation
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825-1898

Sent Via Email: bhubbard@usbr.gov

Subject: Comments on 2010 Water transfer program Issues

Dear Mr. Hubbard,

Thank you for the opportunity to provide comments on the 2010 Water transfer program as presented at the meeting and conference call on October 8, 2009. As you know, the impacts of three consecutive dry years combined with additional regulatory requirements and required water releases for fishery and environmental purposes has created a dire situation for water agencies and their customers. On February 27, 2009, the Governor proclaimed a state of emergency and ordered immediate action to manage this crisis. Subsequently, the Department of Water Resources activated the Drought Water Bank as a short term remedy to facilitate the transfer of water from willing sellers to willing buyers. It is essential that a functioning water transfer program with reasonable criteria be implemented by 2010 in order to sustain our communities, businesses and farms should this year prove to be a fourth consecutive dry year.

According to the draft item Cropland Idling - Issue No. 5b Pasture Idling, "pasture idling will not be allowed as a method of making water available to the 2010 Drought Water Bank until further study can be completed." There was approximately 1,016,203 acres of irrigated pasture in California in 1997 (Reed, 2000), which represents a significant water demand and potentially a significant quantity of water supply that could be otherwise utilized to sustain higher value permanent crops or businesses and to meet basic public health and safety needs should other supplies be unavailable. It does not seem reasonable or prudent to entirely disallow pasture idling simply because it is difficult to determine the pasture quality and associated ETAW.

I urge you to reconsider this position and instead consider establishing justifiable ETAW values based upon the best available data. In many cases, measured water delivery data may exist to fully justify the basis for forgone deliveries. In most cases aerial orthophoto imagery or infrared remote sensing imagery may be available to determine pasture quality and associated ETAW. Absent such data, it would be reasonable to establish ETAW values for low, medium and high quality pasture, which could be

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determined by County Ag Department staff or a qualified consultant and documented using digital photos.

Disallowing pasture idling will deny a large segment of willing sellers, representing a considerable quantity of water supply, from contributing to the 2010 transfer program which is the only viable short term remedy to avoid an economic and social disaster with long-term consequences should 2010 prove to be a drought year!

Please contact me if you have any questions or if I can be of assistance.

Sincerely,

David J. Coxey
General Manager

Encl: Issue No. 5b - DRAFT Pasture Idling

Cropland Idling

Issue No. 5b - DRAFT Pasture Idling

Background

Issue

Like alfalfa, pasture is a multi-year crop that requires renovating periodically to keep the fields weed free and healthy. Once idled, pasture would require reseeding or a complete re-working of the field before returning to full production.

Discussion

There have been many transfer requests based on idling of pasture. The requests have been declined due to the extreme variation in quality of pasture and actual baseline evapo-transpiration pattern of applied water (ETAW) values. Pasture quality variation can range from poorly irrigated weedy grass with low ETAW (if any water is applied at all) to lush well managed mixed pasture with full evapo-transpiration (ET) demand. This point is very important due to resources needed to verify the quality of pasture prior to the transfer period to assess the value of the specific transfer (quantity of real water available). An alternative to specific transfer review would be to assign an average ETAW value to pasture and assume real water amounts average out between good and poor pastures.

Under a pasture idling program, growers would irrigate the pasture following their typical practices in the spring and early summer. The pasture would then be completely disced under by July 1st to assure no water is being used by the pasture. The water the pasture would have used in July, August, and September would then be made available for transfer.

Recommendation for 2010

Do not allow pasture idling as a method of making water available to the 2010 Drought Water Bank until further study can be completed.

Future Discussions for Long-Term Program

Study of irrigated pasture ET and ETAW to estimate ETAW values for program in potential source areas.